

**REMARKS**

Reconsideration of this application, in view of the following remarks, is respectfully requested.

Claims 1-47 were originally presented for consideration in this application. No claims have been canceled or added. Accordingly, claims 1-47 are currently pending in this application.

The following rejections were set forth in the Office Action:

1. Claims 1, 3-8, 11, 15-28, 30-34, 37, 38 and 42-47 stand rejected under 35 USC §102(b) as being anticipated by U.S. Published Application No. 2002/0157826 of MacKenzie, et al.; and

2. Claims 2, 9, 10, 12-14, 29, 35, 36 and 39-41 stand rejected under 35 USC §103 as being unpatentable over MacKenzie in view of U.S. Published Application No. 2004/0194971 of Thomson.

The invention relates to a manner of sealing a wellbore junction. In one example shown in FIG. 1, a liner string 22 is installed in a branch wellbore through a window 18 in casing 14 in a main wellbore 12. The liner string has a swellable sealing material 30 on it which swells to seal against the interior of the window 18. In another example shown in FIG. 4, swellable sealing material 30 is located on a sleeve 44 in the main wellbore. The material swells to seal against an upper cut-off end 50 of a liner string 46 in the branch wellbore.

All of the independent claims 1, 11, 21 and 38 (and many of the dependent claims) are rejected as being anticipated by the MacKenzie reference (US 2002/0157826). The remaining claims are rejected as being obvious over MacKenzie in view of the Thomson

reference (US 2004/0194971).

MacKenzie does describe a rubber material 20 encircling a sleeve 12 attached to a liner string 36 installed in a branch wellbore, and the sleeve 12 is positioned within a window 40 in the main wellbore 30. However, there simply is no description in MacKenzie of sealing between the material 20 and the window 40, or even between the material and the branch wellbore. Instead, the material is used to close off slots in the sleeve 12 so that the sleeve is more easily expandable.

Please see paragraph 28 of MacKenzie, which describes the process of expanding the "junction" 10. An element 42 is expanded within the "junction" 10, thereby expanding the junction, and then the element 42 is unexpanded or deflated, and is withdrawn from within the junction. "This leaves junction 10 in place against the walls of borehole 32 with a small enough gap between the borehole and the junction 10 to facilitate natural sand bridging and therefore exclude such sand from the primary borehole 30.

Thus, MacKenzie clearly does not describe any seal being formed between the junction and the borehole or window. Instead, there is actually a gap remaining after the junction is expanded.

Independent claim 1 recites that a method of completing a well includes the step of swelling a sealing material on an assembly, so that a seal is formed between the assembly and the window. MacKenzie does not describe this step, at least in part because MacKenzie does not describe swelling a sealing material on an assembly, and MacKenzie does not describe swelling the sealing material so that a seal is formed between the assembly and the window. Therefore, claim 1 is not anticipated by MacKenzie, and the examiner is respectfully requested to withdraw the rejections of claim 1 and its dependents.

Independent claim 11 recites a completion system for a well in which the system includes a sealing material on a portion of a tubular string, the sealing material swelling in the well to thereby form a seal between the tubular string portion and a window. MacKenzie does not describe swelling a sealing material in a well, and MacKenzie does

not describe swelling a sealing material to thereby form a seal between a portion of a tubular string and a window. Therefore, claim 11 is not anticipated by MacKenzie, and the examiner is respectfully requested to withdraw the rejections of claim 11 and its dependents.

Independent claim 21 recites a method of completing a well which includes the step of swelling a sealing material on an assembly, so that a seal is formed about an opening formed through a sidewall of the assembly. MacKenzie does not describe swelling a sealing material, and MacKenzie does not describe swelling a sealing material to seal about an opening in an assembly sidewall. Therefore, claim 21 is not anticipated by MacKenzie, and the examiner is respectfully requested to withdraw the rejections of claim 21 and its dependents.

Independent claim 38 recites a completion system for a well in which the system includes an opening in an assembly aligned with a window in a parent wellbore, and a sealing material on the assembly. The sealing material swells in the well to thereby form a seal circumferentially about the opening. MacKenzie does not describe swelling a sealing material, and MacKenzie does not describe swelling a sealing material to form a seal circumferentially about an opening in an assembly aligned with a window in a parent wellbore. Therefore, claim 38 is not anticipated by MacKenzie, and the examiner is respectfully requested to withdraw the rejections of claim 38 and its dependents.

Regarding the obviousness rejections, these rejections are respectfully traversed. The Thomson reference is used for its teaching of rubber as a swellable material. Clearly, there are various types of rubber and various materials can be made of various compositions of rubber, some of which might be swellable in a well, and others which might not be swellable in a well. However, clearly neither Thomson nor MacKenzie teaches or suggests the invention recited in the claims in the application. In fact, MacKenzie teaches away from the invention, in that MacKenzie teaches that a gap should be left between a junction and a borehole. Thomson clearly does not even suggest using swellable material for sealing an intersection between a primary wellbore


and a branch wellbore. Therefore, a *prima facie* case of obviousness has not been made out, and the examiner is respectfully requested to withdraw the obviousness rejections.

In view of the foregoing remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 1-47 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

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